

Exhibit 7

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

- - -

IN RE: NATIONAL : HON. DAN A. POLSTER
PRESCRIPTION OPIATE :
LITIGATION :
:
APPLIES TO ALL CASES :NO.
:1:17-MD-2804

- HIGHLY CONFIDENTIAL -

SUBJECT TO FURTHER CONFIDENTIALITY REVIEW

- - -
December 13, 2018
- - -

Videotaped sworn deposition of
DAVID A. MYERS, JR., taken pursuant to
notice, was held at LIEFF CABRASER
HEIMANN & BERNSTEIN, LLP, 250 Hudson
Street, 8th Floor, New York, New York,
beginning at 9:15 a.m., on the above
date, before Margaret M. Reihl, a
Registered Professional Reporter,
Certified Shorthand Reporter, Certified
Realtime Reporter, and Notary Public.

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GOLKOW LITIGATION SERVICES
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deps@golkow.com

1 A. Thank you.

2 Q. Do you remem -- you recall about
3 when you were promoted to senior manager of
4 product operations?

5 A. Well, it wasn't a promotion, it
6 was just a title change. The job just morphed
7 into something else. You know, different
8 companies will call you something different.
9 And, again, the communications portion came off,
10 so the communications portion came off of my
11 title.

12 Q. Did that happen in conjunction
13 with the Watson acquisition?

14 MS. MAHONEY: Objection.

15 THE WITNESS: It became more in
16 conjunction with Teva acquisition.

17 BY MR. MELAMED:

18 Q. So is it accurate to say you were
19 senior manager of products and communications up
20 until the Teva acquisition?

21 A. Yes.

22 Q. And at that point you became
23 senior manager of product operations at Teva,
24 right?

1 A. Yes, but at Watson, we -- when it
2 was Watson Actavis, because Watson bought
3 Actavis and then changed their name to Actavis,
4 so it's a little confusing.

5 Q. It is.

6 A. Watson did not believe in really
7 advertising generic pharmaceuticals. So
8 although random things would come up for me,
9 rarely did I get involved in communications,
10 even though the title didn't change, just so you
11 know.

12 Q. When you were senior manager of
13 products and communications at Actavis from,
14 let's say -- do you recall who you reported to
15 when you were in that position?

16 A. As senior manager?

17 Q. Yes.

18 A. I was promoted by Jinping
19 McCormick, and then when Watson bought Actavis,
20 Jinping did not go on with the company, and then
21 I reported to Napoleon Clark.

22 Q. Did you report to Jinping
23 McCormick prior to the Watson acquisition?

24 A. Yes.

1 Q. When did you start reporting to
2 Jinping McCormick?

3 A. I don't remember the specific
4 date.

5 Q. Is it -- was that -- did you
6 start reporting to Jinping McCormick in or
7 around 2010 when you were promoted to senior
8 manager?

9 A. Yes, she promoted me.

10 Q. Okay. Prior to being promoted to
11 senior manager, do you recall to whom you
12 reported in 2009 as the manager of products and
13 communications?

14 A. That may have been Jinping then
15 too. In 2009, I think so.

16 Q. Do you recall in 2008?

17 MS. MAHONEY: Objection.

18 THE WITNESS: I'm not exactly
19 sure. I don't know when Jinping became
20 director of marketing.

21 BY MR. MELAMED:

22 Q. Prior to Jinping McCormick
23 becoming -- let me withdraw that.

24 Upon Jinping McCormick becoming